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REMARKS

Claims 1 and 13 stand rejected under 35 USC 102 over Lindberg et al. Claim 1 has been amended to include the features of claim 13. Applicant submits that the amended claim 1 is not anticipated by Lindberg et al.

Claim 1, as now amended, recites input (and output) terminals of the routing switch, signal input (and output) terminals of the router modules and expansion input (and output) terminals of the router modules. Claim 1 distinguishes between the signal terminals and the expansion terminals of the router modules by specifying that the input terminals of the switch are connected through input interface circuitry to the signal input terminals of the router modules and that the signal output terminals of the router modules are connected through output interface circuitry to the output terminals of the router and specifying that the expansion input terminal of the first router module and the expansion output terminal of the first router module are connected respectively to the expansion output terminal of the second router module.

Lindberg et al discloses a switch apparatus comprising a normal rate switch 14 having n+m input terminals and n+m output terminals and a subrate switch 12 having m input terminals and m output terminals. The m input terminals of the subrate switch are connected to m of the n+m output terminals of the normal rate switch and the m output terminals of the subrate switch are connected to m of the n+m input terminals of the normal rate switch. The examiner considers the switch 14 to be an apt counterpart of the first router module of claim 1 and the switch 12 to be an apt counterpart of the second router module of claim 1.

The examiner considers that the input terminals 1-n of the normal rate switch 14 are apt counterparts of the N1 signal input terminals recited in claim 1. Let us assume for purposes of discussion that the switch apparatus has n input terminals that are connected through input interface circuitry to the terminals 1-n of the normal rate switch. In order to satisfy claim 1, the switch apparatus must have N2 input terminals connected through the input interface circuitry to input terminals of the subrate switch 12 but Lindberg contains no disclosure of this feature. Similarly, the switch apparatus of

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Lindbergh et al does not have output terminals to which signal output terminals of the subrate switch 12 are connected.

Lindberg et al does not disclose input interface circuitry and output interface circuitry within the meaning of claim 1, as now The examiner's only comment in the Office Action concerning the interface circuitry, which was originally recited in claim 13, is that the input terminal includes the interface circuitry. Although it might be inherent in Lindberg et al that input terminals of the switch apparatus are connected through input interface circuitry to the input terminals 1-n of the normal rate switch, and similarly that the output terminals 1-n of the normal rate switch are connected through output interface circuitry to n output terminals of the switch apparatus, such interface circuitry does not constitute interface circuitry within the meaning of claim 1 because it does not connect input terminals of the switch to the input terminals of the subrate switch 12 or output terminals of the subrate switch 12 to output terminals of the apparatus.

In view of the foregoing, applicant submits that claim 1 is not anticipated by Lindberg et al.

In support of the rejection of claim 12, the examiner draws attention to FIG. 3 of Lindberg et al, which discloses that the subrate switch 12 is composed of multiple modules MO-M7.

Claim 12 is directed to a routing switch comprising n routers each comprising p router modules. Claim 12 specifies that n is greater than 1. The examiner has pointed out that FIG. 3 of Lindberg et al shows that the subrate switch 12 comprises multiple modules. However, this is not sufficient to satisfy claim 12 since the examiner has not asserted that the normal rate switch comprises p router modules. Further, claim 12 requires that each of the router modules should have a plurality of signal input terminals and a plurality of signal output terminals, whereas the modules shown in FIG. 3 each have only one signal input terminal and one signal output terminal, e.g. the terminals marked FROM TSMO and TO TSMO respectively in the case of the module MO.

In view of the foregoing, applicant submits that claim 12 is not anticipated by Lindberg et al.

Respectfully submitted,

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